## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

LINDA THORNTON, \*

\*

Plaintiff, \*

\*

v. \* Civil Action No.:

1:07 cv-712-WKW

FLAVOR HOUSE PRODUCTS, INC., and \* FRANKLIN D. WILLIAMS, JR., \*

\*

Defendants. \* JURY DEMAND

## PLAINTIFF'S MOTION TO EXTEND DISPOSITIVE MOTION AND DISCOVERY DEADLINES

COMES NOW Plaintiff Linda Thornton and moves the Court to extend the dispositive motion deadline until June 16, 2008 and the discovery deadline until June 19, 2008. In support of this motion, the parties state as follows:

- 1. The Court entered an Order on April 3, 2008, extending deadline for dispositive motions until May 2, 2008.
- At that time the parties had depositions scheduled for April 8-10, 2008 in Dothan,
   Alabama.
- 3. On April 7, 2008, lead counsel for plaintiff, who was going to be conducting the depositions in Dothan the following three days, had to return to the hospital for health problems, causing the depositions to be canceled. The remaining counsel for plaintiff could not fill in and do the depositions due to conflicts in other cases.
- 4. The dispositive motion deadline is currently set for May 2, 2008 and the discovery deadline is currently set for May 5, 2008.
- 5. The earliest dates which the depositions could be rescheduled were May 12-14, 2008,

in Dothan, Alabama.

6. Defendants do not oppose this motion.

WHEREFORE, the Plaintiff respectfully requests that the Court grant this motion and extend the dispositive motion deadline until June 16, 2008 and the discovery deadline until June 19, 2008. Plaintiff does not anticipate any further extensions being needed in this matter.

Respectfully submitted,

s/ Ann C. Robertson
Temple D. Trueblood
Ann C. Robertson
Counsel for Plaintiff

OF COUNSEL: WIGGINS, CHILDS, QUINN & PANTAZIS, L.L.C. The Kress Building 301 19th Street North Birmingham, Alabama 35203 (205) 314-0500

CO-COUNSEL: Bobbie S. Crook, Esq. 367 South St. Andrews Street Dothan, Alabama 36301 (334) 671-8062

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following via filing through the CM/ECF system::

Jennifer F. Swain Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 1600 Wachovia Tower 420 North Twentieth Street Birmingham, Alabama 35203

Steadman S. Shealy, Jr. Richard E. Crum M. Russ Goodman Shealy, Crum & Pike, P.A. P.O. Box 6346 Dothan, Alabama 36302-6346

on this the 24<sup>th</sup> day of April, 2008.

s/ Ann C. Robertson OF COUNSEL